

L.B.F. 2016-3A

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Tracy Mack

) Chapter 13

) Bankruptcy No. 19-17096amc

Debtor(s))

MOTION TO ABATE AND MODIFY CHAPTER 13 PLAN POST-CONFIRMATION

Pursuant to L.B.R. 3015-5, the debtor(s) request(s) an order permitting modification of the Chapter 13 plan post-confirmation and make(s) the following representations in support of this request:

1. The debtor(s) filed this Chapter 13 bankruptcy petition on November 11, 2019.
2. The Second Amended Chapter 13 Plan was confirmed on July 15, 2020.
3. The base amount of the confirmed Plan was \$17,581.96, including trustee's commission.
4. To date, Debtor has paid \$2,754.00 and is in arrears \$300.00.
5. Santander filed a Motion for Relief regarding Debtor's vehicle, the loan for which has matured. A stipulation has resolved the Motion requiring Debtor to pay the balance of the Debt, \$10,107.00, including interest, through the Plan
6. Debtor proposes to amend the plan post-confirmation to abate the one month arrears and to include the debt to Santander. The new Base amount will be \$29,122.00, and the monthly Plan payment will remain the same at \$358.00 per month for twelve (12) months. Thereafter, the Plan payment will increase to \$712.00 per month for the balance of the Plan.
7. The proposed Modified Plan as well as Amended Schedules I and J will be filed.

WHEREFORE, the Debtor prays that this Court grant the Motion to Abate and Modify

Chapter 13 Plan Post-Confirmation.

/s/ Sharon S. Masters, Esq.

Sharon S. Masters, Esq.

Counsel for Debtor(s)

Dated: 5/25/2021

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ORDER

AND NOW, this ____ day of _____, 2021, after consideration of Debtor's Motion to Abate and Modify Plan Post-Confirmation, the response(s) thereto and hearing thereon, it is hereby ORDERED that the Motion is hereby GRANTED.

The Third Amended Plan shall be filed within (5) days of entry of this Order and shall take effect immediately thereafter.

J.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re: Tracy Mack

Case No.: 19-17096

Chapter: 13

Debtor(s)

CERTIFICATE OF SERVICE

I, Sharon S. Masters, attorney for Debtor Tracy Mack, do hereby certify that on 5/25/2021 I served a true and correct copy of the Notice and Motion to Abate and Modify Plan on the United States Trustee and the Chapter 13 Trustee, and on the following by first-class mail, postage prepaid:

US Dept of Housing and Urban Development
100 Penn Square East 11th Floor
Philadelphia, Pa 19107

PHFA
211 N. Front St.
Harrisburg, PA 17101

Rebecca A. Solarz
KML Law Group
701 Market Street Ste. 5000
Philadelphia, PA 19106

Capital One Bank
4515 N. Santa Fe Ave.
Oklahoma City, OK 73118

Santander Consumer USA
POB 91245
Ft. Worth, TX 76161

Philadelphia Federal Credit Union
12800 Townsend Rd.
Philadelphia, PA 19154

American Express National Bank
c/o Becket and Lee LLP
POB 3001
Malvern, PA 19355

QuantumGroup LLC as agent for
Comenity Bank
POB 788
Kirkland, WA 98083

Department Stores National Bank
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/

/s/ Sharon S. Masters, Esq.
Sharon S. Masters, Esq.
Attorney for Debtor